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Attorneys for PNC BANK, NATIONAL ASSOCIATION

IN THE MATTER OF:

Linda CiarelliRichard R. Ciarelli

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 22-13306 CMG

**NOTICE OF OBJECTION**

I, Denise Carlon, the undersigned, Esquire For KML Law Group, P.C., attorney for Secured Creditor **PNC BANK, NATIONAL ASSOCIATION**, the holder of a Mortgage on the debtors' premises at **20 Buckingham Drive Ocean, NJ 07712** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. The claims bar date is July 5, 2022. Secured Creditor intends to file a claim on or before the bar date with the total debt estimated at \$154,970.27.
2. Debtor's plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. The Debtor's proposed plan calls for the sale or refinance of the aforesaid premises, which sale provision does not satisfy the feasibility requirements of 11 U.S.C. 1325 (a) (6). The sale or refinance of the property is remote and speculative and therefore the plan is not feasible.
4. Debtor's Plan understates the amount of the Secured Creditor's claim by \$154,970.27, and does not provide sufficient funding to pay said claim.
5. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/Denise Carlon, Esquire

Denise Carlon, Esquire  
Attorney for PNC BANK, NATIONAL ASSOCIATION

Dated: June 14, 2022